

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

**JOSHUA BLACKBURN,**  
Individually and on behalf of all others  
similarly situated

*Plaintiff,*

**V.**

**CONDUENT COMMERCIAL  
SOLUTIONS LLC,**

*Defendant.*

**S S S S S S S S S S S S**

**Civil Action No. 1:19-CV-1229-RP**

## JURY TRIAL DEMANDED

**COLLECTIVE ACTION  
PURSUANT TO 29 U.S.C. §216(b)**

**CLASS ACTION  
PURSUANT TO FED. R. CIV. P. 23(b)**

**JOINT MOTION TO STAY THE CASE AND STIPULATION REGARDING TOLLING  
OF THE STATUTE OF LIMITATIONS PURSUANT TO 29 U.S.C. § 216(b)**

TO THE HONORABLE COURT:

Plaintiff Joshua Blackburn and Defendant Conduent Commercial Solutions, LLC (collectively, “the Parties”), jointly move this Court to stay the case, and stipulate to toll the statute of limitations for all persons who become members of any putative class in this action from April 9, 2020 until July 15, 2020.

1. Counsel for the Parties are currently engaged in settlement negotiations and intend mediating this matter in May, 2020. The Parties seek a ninety-seven (97) day stay of the case to facilitate these ongoing negotiations.

2. The Parties further stipulate that the statute of limitations for all future opt-ins, if any, is tolled from April 9, 2020 until July 15, 2020. The Parties agree that this tolling period is the same length as the stay and is contingent on the stay remaining in place until July 15, 2020.

3. If the stay is terminated early, the Parties agree that the tolling period ends on the date on which the stay ends. This tolling agreement extends only to the future opt-ins' potential claims

under the FLSA in this lawsuit; it does not extend to any FLSA claims or other claims that the future opt-ins may assert in any other current or future lawsuit against Conduent.

4. No prejudice will result to either Party by granting this request, nor will any putative class member be prejudiced, as the Parties stipulate to tolling of the statute of limitations as is set forth above.

5. The Parties attest this motion is not made for the purpose of the delay.

WHEREFORE, the Parties respectfully request this Court grant the requested stay of this matter so that the Parties can pursue a potential resolution to this matter, to begin upon the entry of the Order granting the stay.

Dated this 9th day of April, 2020.

Respectfully submitted,

/s/ Clif Alexander

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THE PUTATIVE CLASS MEMBERS**

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**ATTORNEYS FOR DEFENDANT  
CONDUENT COMMERCIAL SOLUTIONS,  
LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2020, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Clif Alexander  
Clif Alexander